

Law Office of
James C. Thomas III

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August 16, 2012

VIA FEDERAL EXPRESS

Jeff S. Jordan
Supervising Attorney
Complaints Examination &
Legal Administration
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Re: Now or Never PAC
Matter Number: MUR 6616

Dear Mr. Jordan:

I am the treasurer and counsel for Now or Never PAC (the "Committee"). On August 6, 2012 I received your letter to the Committee dated August 2, 2012. I am making this response on behalf of the Committee and on behalf of myself as treasurer for the Committee. Although it is somewhat redundant, I have enclosed a Statement of Designation of Counsel for the Committee so that your files will be complete.

Your letter states that you have received a complaint that indicates that the Committee may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). Your letter attaches a complaint (the "Complaint"). The Complaint has been submitted by Elizabeth S. Frericks who states that she is a taxpayer, concerned citizen and registered voter of Missouri. I have no idea whether these statements by Ms. Frericks are true or not.

Ms. Frericks asserts the following violations of the campaign finance law:

- (1) Missouri Leadership Committee failed to register as a political committee with the FEC when it spent more than \$1,000 to influence a federal election; and
- (2) The Steelman Campaign, through its agent and campaign chairman, financed, directed or controlled non-federal funds by furnishing \$25,000 to Now or Never PAC through Missouri Leadership, a state committee financed by Friends of Steve Tilley.

I sincerely appreciate the appropriateness of contacting the Committee and me regarding the factual matters raised in the Complaint. However, I fail to see that either of the violations alleged by Ms. Frericks point to any wrongdoing by the Committee.

OFFICE OF
COMPLAINTS
2012 AUG 17 AM 10:29
FEDERAL ELECTION
COMMISSION

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Mr. Jeff S. Jordon,
Supervising Attorney
Complaints Examination &
Legal Administration
Federal Election Commission
August 16, 2012

The Committee is an independent expenditure only political committee. It is not a candidate committee that is subject to the dollar limitations and the generally only individual donor limitations that apply to a candidate committee. The Committee can receive unlimited contributions from individuals, corporations, labor unions and political committees.

The Committee has no knowledge of whether or not the Missouri Leadership Committee has registered as a political committee with the FEC. However, the obligation of the Missouri Leadership Committee to register with the FEC is the responsibility of the Missouri Leadership Committee and not an obligation of the Committee.

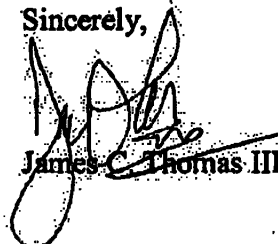
The Committee has no knowledge as to whether the "Steelman Campaign" (which Ms. Frericks does not more precisely define), through its agent and campaign chairman, financed, directed or controlled non-federal funds by furnishing \$25,000 to Now or Never PAC through Missouri Leadership, a state committee financed by Friends of Steve Tilley. The Committee is intentionally not in communication with Steelman for US Senate (the "Steelman Committee") or its representatives or Sarah Steelman. The Committee has not investigated (and has no obligation to investigate) Missouri Leadership Committee or its sources of funding.

I would have to say that I got a cluck when Ms. Frericks cited a blog, Fired Up Missouri, to support one of her assertions. It is well known in Missouri political circles that Fired Up Missouri is a blog closely associated with the Missouri Democrat Party or its agents. Fired Up Missouri is never a legitimate authority to be cited for any factual statement.

I hope this assists you in your review of the facts regarding the complaint. The Committee has committed no violations of the Act and has no knowledge of the internal workings of the Missouri Leadership Committee, the Steelman Committee or the "Steelman Campaign." I appreciate that this is an important matter, but the Complaint should be summarily dismissed to the extent of its assertion that the Committee in any way violated the Act.

If I can be of further assistance with your investigation, please contact me.

Sincerely,



James C. Thomas III

JCT3/pb
Enclosures

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FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

RECEIVED
FEDERAL ELECTION
COMMISSION

2012 AUG 17 AM 10:29

STATEMENT OF DESIGNATION OF COUNSEL
Please use one form for each Respondent/Entity/Treasurer.
FAX (202) 219-3923

MUR # 6616

NAME OF COUNSEL: James C. Thomas III

FIRM: Law Office of James C. Thomas III

ADDRESS: 4131 N. Mulberry Drive, Suite 200

Kansas City, MO 64116

TELEPHONE- OFFICE (816) 584-9393

FAX (816) 584-9394

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

8/16/12
Date

[Signature]
Respondent/Agent-Signature

Treasurer
Title (Treasurer/Candidate/Owner)

NAMED RESPONDENT: Now or Never PAC

MAILING ADDRESS: 4131 N. Mulberry Drive, Suite 200
(Please Print)

Kansas City, MO 64116

TELEPHONE- HOME ()

BUSINESS (816) 584-9393

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

Rev. 2006

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